

JOEL A. ACKERMAN
JA 4027

XWA-129295-1/dmo
ZUCKER, GOLDBERG & ACKERMAN, LLC
Attorneys for Secured Creditor,
Wells Fargo Bank, N.A.
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IN RE:	:	UNITED STATES BANKRUPTCY COURT
	:	FOR THE DISTRICT OF NEW JERSEY
	:	CHAPTER 13
James W Frankovic	:	CASE NO. 13-24058-RG
Debtor	:	NOTICE OF OBJECTION
	:	(CONFIRMATION HEARING DATE:
	:	September 4, 2013 @ 9:00am)

The undersigned, ZUCKER, GOLDBERG & ACKERMAN, LLC, attorneys for Secured Creditor Wells Fargo Bank, N.A., the holder of a Mortgage on the debtor's premises at 15 Nestling Wood Drive, Washington, NJ 07853 hereby objects to the confirmation of the debtor's proposed Chapter 13 Plan in the event the debtor fails to make the regular monthly mortgage payments to the Secured Creditor, outside of the Chapter 13 Plan, in accordance with the provisions of said Plan, in violation of 11 U.S.C. 1326.

Furthermore, the Secured Creditor objects to any provision in the debtor's plan which provides for an amount less than the amount due the Secured Creditor as set forth in its Proof of Claim.

In the event the debtor cures the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and the aforesaid objection should be deemed waived.

ZUCKER, GOLDBERG & ACKERMAN, LLC
ATTORNEYS FOR SECURED CREDITOR
/s/ JOEL A. ACKERMAN
JOEL A. ACKERMAN
MEMBER OF THE FIRM

DATED: June 28, 2013

This is an attempt to collect a debt. Any information obtained will be used for that purpose.